

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.

Defendant/Third-Party Plaintiff,

v.

JAMES EDWARD STALEY

Third-Party Defendant.

Case Number: 1:22-cv-10019-JSR

**THIRD-PARTY DEFENDANT JAMES STALEY’S MOTION TO EXCLUDE
JPMORGAN CHASE BANK, N.A.’S PROFFERED EXPERT OPINIONS**

Pursuant to Federal Rules of Evidence 402, 403, 408, and 702, and Federal Rule of Civil Procedure 26, James Staley hereby respectfully requests that the Court exclude the expert opinions of Edith Wong, Shelley Chapman, and Carlyn Irwin, proffered by Third-Party Plaintiff JPMorgan Chase Bank, N.A. The reasons supporting this motion are set forth in a separately filed Memorandum of Law.

As set forth in an email from chambers to counsel dated for all parties dated September 15, 2023, the moving papers regarding expert opinions on the third-party claims shall be filed no later than September 20, 2023, answering responsive briefs shall be filed no later than September 27, 2023, and reply briefs shall be filed no later than October 3, 2023.

Date: September 20, 2023

Respectfully submitted,

By: /s/ John M. McNichols

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